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UBER TECHNOLOGIES, INC.  
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WAYMO LLC,  
  
Plaintiff,  
  
v.  
  
UBER TECHNOLOGIES, INC.,  
OTTOMOTTO LLC; OTTO TRUCKING LLC,  
  
Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MARTHA L.  
GOODMAN IN SUPPORT OF  
DEFENDANT UBER  
TECHNOLOGIES, INC. AND  
OTTOMOTTO LLC'S OPPOSITION  
TO WAYMO'S MOTION TO  
COMPEL FURTHER 30(B)(6)  
TESTIMONY**

Judge: Hon. Jacqueline Scott Corley  
Trial Date: October 10, 2017

1 I, Martha L. Goodman, declare as follows:

2 1. I am an attorney at the law firm of Boies Schiller Flexner LLP representing  
3 Defendants Uber Technologies Inc. and Ottomotto LLC (collectively, “Uber”) in this matter. I  
4 am a member in good standing of the Bar of the State of California. I make this declaration in  
5 support of Defendant Uber Technologies and Ottomotto LLC’s Opposition to Plaintiff Waymo  
6 LLC’s Motion for Relief from Nondispositive Pretrial Order of Magistrate Judge (Dkt. 1276). I  
7 make this declaration based on personal knowledge and if called as a witness, I could and would  
8 competently testify to the matters set forth herein.

9 2. Attached as **Exhibit 1** is a true and correct copy of Defendants Uber Technologies  
10 and Ottomotto LLC’s Objections and Responses to Waymo’s 30(b)(6) Notice, served on August  
11 8, 2017.

12 3. Attached as **Exhibit 2** is a true and correct copy of excerpts of the certified  
13 30(b)(6) deposition transcript of Eric Meyhofer, dated August 18, 2017.

14 4. Attached as **Exhibit 3** is a true and correct copy of excerpts of the certified  
15 deposition transcripts of:

- 16 • **John Bares**, Pages 37:1- 37:14, 38:1- 38:3, 38:18- 39:2, 40:6- 40:22, 99:13-  
17 99:18, 212:4- 212:15, 293:6- 293:20 (June 16, 2017 and August 11, 2017);
- 18 • **Scott Boehmke**, Pages 12:1- 12:4, 14:16- 14:22, 15:6- 15:12, 34:14- 35:3, 36:4-  
19 36:21, 40:16- 40:25, 42:21- 43:12, 55:17- 56:2, 293:7- 293:18, 294:2- 294:8,  
20 296:10- 296:15 (April 17, 2017 and July 28, 2017);
- 21 • **Donald Burnette**, Pages 144:3- 144:15, 149:17- 151:25 (August 18, 2017);
- 22 • **Daniel Gruver**, Pages 224:15- 224:21, 250:23- 251:10, 290:23- 292:16, 351:22-  
23 352:11, 356:15- 357:5, 359:4- 359:15, 362:1- 362:15, 371:12- 371:21, 374:10-  
24 374:16, 409:19- 410:5 (August 4, 2017);
- 25 • **James Haslim**, Pages 139:23- 140:4, 141:19- 142:3, 143:21- 144:2, 145:12-  
26 146:6, 146:15- 146:22, 150:1- 150:19, 266:8- 266:16, 279:20- 280:5, 512:19-  
27 512:25, 513:1- 513:4, 513:16- 513:20 (May 4, 2017 and August 9, 2017);
- 28 • **Jeff Holden**, Pages 55:5- 55:13, 66:23- 68:8, 68:15- 69:8, 267:1- 268:18, 271:7-

271:21 (August 15, 2017);

- **Travis Kalanick**, Pages 177:25- 179:4, 195:1- 195:15, 278:9- 278:22, 287:10- 287:25 (July 27, 2017);
- **Adam Kenvarg**, Pages 83:14- 84:2, 84:25- 85:16, 93:3- 93:14, 124:9- 124:16 (August 15, 2017);
- **Sameer Kshirsagar**, Pages 33:11- 36:8 (April 14, 2017);
- **Maxime Levandowski**, Pages 63:23- 64:9, 87:14- 87:25, 111:23- 112:3, 112:11- 112:15, 246:3- 246:11, 246:25- 247:4, 247:11- 247:25, 249:1- 249:12, 265:22- 267:8 (July 18, 2017);
- **Asheem Linaval**, Pages 219:7- 220:10, 222:1- 222:5, 224:11- 224:19 (August 15, 2017);
- **Brian McClendon**, Pages 170:17- 171:11 (August 1, 2017);
- **Emil Michael**, Pages 59:10- 60:12 (July 28, 2017);
- **Matthew Palomar**, Pages 151:11- 152:9, 154:23- 155:14 (August 18, 2017);
- **Gaetan Pennecot**, Pages 42:12- 42:18, 43:1- 43:3, 45:6- 45:10, 72:18- 72:20, 76:20- 76:25, 77:1- 77:5, 197:11- 197:16, 198:3- 198:6, 198:21- 198:24, 202:7- 202:12, 203:20- 204:1, 294:24- 295:9, 298:2- 298:17, 716:17- 717:2, 723:10- 723:16 (April 20, 2017, June 14, 2017, June 16, 2017, and August 9, 2017);
- **Cameron Poetzscher**, Pages 106:3- 106:15 (June 19, 2017);
- **Brent Schwarz**, Pages 174:5- 174:20, 175:22- 176:23, 178:10- 178:19, 179:4- 179:9, 181:1- 181:3, 182:6- 183:3 (August 15, 2017);
- **Colin Sebern**, Pages 31:24- 34:4 (August 22, 2017)
- **Ognen Stokanovski**, Pages 290:5- 290:25 (July 20, 2017);
- **William Treichler**, Pages 264:3- 265:14 (August 14, 2017); and
- **Jur Van Den Berg**, Pages 175:17- 176:7, 289:1- 289:9, 296:6- 296:19, 372:23- 373:5 (August 2, 2017).

1 I declare under penalty of perjury under the laws of the United States that the foregoing is  
2 true and correct. Executed this 26th day of August, 2017, in Washington, D.C.

3  
4 /s/ Martha L. Goodman

Martha L. Goodman

5  
6 **ATTESTATION OF E-FILED SIGNATURE**

7 I, Karen L. Dunn, am the ECF User whose ID and password are being used to file this  
8 Declaration. In compliance with General Order 45, X.B., I hereby attest that Martha L. Goodman  
9 has concurred in this filing.

10  
11 /s/ Karen L. Dunn

Karen L. Dunn